



One North Franklin
Chicago, Illinois 60606
Telephone 312.422.3000

June 13, 1995

Edward D. Ryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

JUN 14 3 11 PM '95

Re: American Hospital Association Political Action Committee:
C00106146

Dear Mr. Ryan:

This letter responds to your requests for additional information dated May 16, 1995, regarding the American Hospital Association Political Action Committee. We have responded to each request by amending the appropriate report, when necessary, and providing an explanation of these changes. In many cases, no changes were required and we have discussed these below.

October Monthly Report (9/1/93 - 9/30/93)

AHAPAC made contributions of \$7,000 and \$7,500 to the Democratic Congressional Campaign Committee ("DCCC") in 1993. AHAPAC also contributed \$5000 to the 1993 Special Election Fund, a joint fundraising committee. Of this \$5,000 contribution, \$500 was allocated to the DCCC in accordance with the joint-fundraising formula; it is our understanding that the remaining \$4,500 was allocated according to the formula to the other four joint-fundraising participants, specifically the "Unity Funds" of California, Ohio, Mississippi and Wisconsin. Therefore, the total contribution to DCCC by AHAPAC in 1993 was \$15,000.

Year End Report (12/1/93 - 12/31/93)

AHA has mailed a letter to the Friends of Jim Sasser Campaign requesting that AHAPAC check #5108 in the amount of \$1,000 dated February 22, 1993, payable to Friends of Jim Sasser be redesignated from the 1994 Primary Election to the 1994 General Election (attached).

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Amended February Monthly (1/1/94 - 1/31/94) Reports dated 7/1/94

A clerical error was made in reporting of the Mike Andrews for Senate contribution. The actual check was made payable to Mike Andrews for Congress, not Andrews for Senate, and was intended to support his congressional campaign. A copy of the check is attached. We amended this report to properly reflect this contribution to the Congressional Committee.

April Monthly (3/1/94 - 3/31/94) and Amended April Monthly (3/1/94 - 3/31/94) Reports

AHAPAC has requested a refund in the amount of \$1,000 from the Moynihan Committee and a redesignation of \$2000 from the primary to the general election (see letter attached). It appears that the Healthcare Association of New York PAC made a contribution to the Senate Victory '94 Committee that was allocated to Moynihan for Senate. While we were not aware of this contribution at the time, we have now taken steps to request a refund. An amended Schedule B will be filed upon receipt of this and any other refunds discussed below. We have also taken steps to set up new procedures with our affiliated political committees to more effectively coordinate contributions and avoid issues similar to this and others discussed in this letter.

A letter has been mailed to the Friends of Kent Conrad Committee requesting that AHAPAC check #5519 in the amount of \$5,000 dated March 25, 1994, payable to Friends of Kent Conrad be redesignated from the 1994 Primary election to the 1994 General Election, and check #5520 in the amount of \$2,500 dated March 25, 1994 be redesignated from the 1994 General Election to the 1994 Primary Election (attached). It appears that California Hospitals PAC made a contribution to the Conrad Committee which we were not aware of at the time.

A letter has been mailed to the Hoyer for Congress Committee requesting that \$1,000 of AHAPAC check #5538 in the amount of \$1,500 dated March 29, 1994, payable to Hoyer for Congress be redesignated from the 1994 Primary Election to the 1994 General Election (attached).

AHAPAC contributions to the Fund for Democratic Leadership dated July 20, 1993, December 28, 1993 and February 23, 1994, were listed as "Contributions for Robert T. Matsui (CA-5-D)." These contributions were actually to the Fund for Democratic Leadership, an independent political committee, not an authorized committee of Congressman Matsui, and have been so reflected on the amended Schedule B.

Polling Expenses: You request additional information regarding disbursements reported as contributions, direct and in-kind to Congressman L. F. Payne. AHA erred in reporting polling expenses, which resulted in the false impression that an excessive contribution was made. By amendment, AHA shows the true in-kind (\$4,987.00), within lawful limits, and the remaining

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amount (\$8,313) being properly treated as an operating expense. The value of the in-kind and the amount treated as an operating expense provided to the campaign were determined in accordance with FEC regulation section 106.4. The pollster that conducted the survey was Greenberg Research, Inc., not Michael Rowan.

May Monthly (4/1/94 - 4/30/94) and Amended May Monthly (4/1/94 - 4/30/94) Reports

Rowan Polling Expenses: Schedule B has been amended to reflect the true in-kind contribution for polling expenses and the remaining amount properly treated as an operating expense. See explanation above (April Monthly).

A letter has been mailed to the Lynn Schenk for Congress Campaign requesting that AHAPAC check #5593 in the amount of \$5,000 dated April 27, 1994, payable to Lynn Schenk for Congress be redesignated from the 1994 Primary Election to the 1994 General Election (attached).

A letter requesting a refund in the amount of \$1,000 was mailed to the Gephardt-In-Congress Committee (attached). AHAPAC was not aware that California Hospitals PAC made a contribution to Gephardt-In-Congress during the 1994 cycle.

June Monthly Report (5/1/94 - 5/31/94)

A letter has been mailed to the Rangel for Congress Committee requesting that AHAPAC check #5530 in the amount of \$500 dated March 31, 1994, payable to Rangel for Congress Committee be redesignated from the 1994 Primary Election to the 1994 General Election. In addition, a refund in the amount of \$2,750 is also being requested (attached). AHAPAC was not aware that Healthcare Association of New York PAC made a contribution to Rangel for Congress.

AHAPAC check #5595 dated April 27, 1994, payable to the Senator John Chafee Committee in the amount of \$1,500 was voided. It was never delivered to the candidate. This has been reflected on the attached Schedule B by including a negative entry.

September Monthly (8/1/94 - 8/31/94) and Amended September Monthly (8/1/94 - 8/31/94) Reports

Polling Expenses - Kitchens, Powell & Kitchens: Schedule B has been amended to reflect the true in-kind contributions for polling expenses and the remaining amounts properly treated as operating expenses. See explanation on page 3 (April Monthly).

According to the records of the AHAPAC, the contributions to the Citizens for Wofford

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campaign are designated as follows: AHAPAC, \$1,000: General; 2,000: Primary; HAPAC, \$2,500: General; \$1,500: General. These contributions are within permissible limits. Therefore, we do not understand the request for additional information.

October Monthly (9/1/94 - 9/30/94) and Amended October Monthly (9/1/94 - 9/30/94) Reports

Schedule A has been provided to support the contribution refund from the Feinstein for Senate Committee, reported on Line 16 of the Detailed Summary Page.

A letter has been mailed to the Don Johnson for Congress Committee requesting a refund of \$1,000. (attached).

Polling Expenses - American Viewpoint, Inc.; Mellman, Lazarus, Lake; Voter/Consumer Research. Schedule B has been amended to reflect the true in-kind contributions for polling expenses and the remaining amounts properly treated as operating expenses. See explanation on page 3 (April Monthly).

12 Day Pre-General (10/1/94 - 10/19/94) and Amended 12 Day Pre-General (10/1/94 - 10/19/94) Reports

Polling Expenses - American Viewpoint, Inc.; Garin-Hart Strategic Research; Public Opinion Strategies. Schedule B has been amended to reflect the true in-kind contributions for polling expenses and the remaining amounts properly treated as operating expenses. See explanation on page 3 (April Monthly).

30 Day Post-General (10/20/94 - 11/28/94) and Amended 30 Day Post-General (10/20/94 - 11/28/94) Reports

Schedule B has been amended to reflect the corrected total of \$66,833. This amount differs from the \$71,833 referenced in your letter due to the voided check made payable to Roth Senate Committee (see below). All subsequent reports affected by this change have also been included.

A copy of the Schedule E disclosing independent expenditures is attached. A letter explaining the difference in estimated charges and actual services for one independent expenditure is included.

AHAPAC check #5582 dated April 18, 1994, payable to the Roth Senate Committee in the amount of \$5,000 was voided. It was not delivered to the candidate. This has been reflected on the attached Schedule B by including a negative entry.

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Polling Expenses - Hill Research Consultants: Schedule B has been amended to reflect the true in-kind contributions for polling expenses and the remaining amounts properly treated as operating expenses. See explanation on page 3 (April Monthly).

Amended Year End Report (12/1/94 - 12/31/94) dated 2/17/95

A copy of the Schedule E itemizing independent expenditures is attached. A letter explaining that the billing and disbursement of funds for services occurring in October, 1994 did not occur until December 1994 is attached.

Finally, the AHA has recently improved its record keeping by installing an internal automated database which has greatly enhanced the ability to track disbursements. This system is in place for the 1996 cycle.

If you have any questions, please call Mark Seklecki at (202) 638-1100.

Sincerely,



Sidney Jacob
Treasurer

attachments



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
PUBLIC DISCLOSURE
SECTION

JUN 15 11 07 AM '95
RQ-2

Sidney Jacob, Treasurer
Political Action Committee of the
American Hospital Association
One North Franklin Street
Chicago, IL 60606

MAY 16 1995

Identification Number: C00106146

Reference: October Monthly Report (9/1/93-9/30/93)

Dear Mr. Jacob:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a national political party in excess of \$15,000 in a calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$15,000. In the best interest of your committee, all refunds should be made within sixty days of the treasurer's receipt of the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the contributor. In addition, any refunds should be disclosed on schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the excessive contribution(s), prompt action in obtaining a refund will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

05039791717

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
FISCAL YEAR CLOSURE
11/15/93

TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
American Hospital Association PAC

ADDRESS (number and street) ☐ Check if different than previously reported
840 North Lake Shore Drive

CITY, STATE and ZIP CODE
Chicago, IL 60611

2. FEC IDENTIFICATION NUMBER
CO-010646

3. ☒ This committee qualified as a multicandidate committee DURING THIS Reporting Period on 11/22/78 (date).

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☒ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____

_____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 5/1/93 through 5/31/93		
6. (a) Cash on Hand January 1, 19 93		\$ 332,756.75
(b) Cash on Hand at Beginning of Reporting Period	\$ 328,087.28	
(c) Total Receipts (from Line 19)	\$ 20,512.47	\$ 47,893.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 348,599.75	\$ 380,649.75
7. Total Disbursements (from Line 20)	\$ 57,039.32	\$ 89,089.32
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 291,560.43	\$ 291,560.43
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Sidney Jacob

Signature of Treasurer

Date

5/24/93

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X

(revised 3/1/91)

DETAILED SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS

PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE <u>American Hospital Association PAC</u>		REPORT COVERING PERIOD FROM <u>3-1-93</u> TO: <u>3-31-93</u>	
		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)		6,500.00	20,275.00
ii. Unitemized		4,781.25	17,155.00
iii. Total (add i and ii) >		11,281.25	37,428.00
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contributions (add a ii, b and c) >		11,281.25	37,428.00
12. Transfers From Affiliated/Other Party Committees		8,600.00	8,600.00
13. All Loans Received			
14. Loan Repayments Received			
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)			
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			
17. Other Federal Receipts (Dividends, interest, etc.) *		631.22	1,865.00
18. Transfers from Nonfederal Account for Joint Activity			
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >		20,512.47	47,893.00
20. Total Federal Receipts (subtract line 18 from line 19) >		20,512.47	47,893.00
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share			
ii. Non-Federal Share		6,939.32	6,939.32
b. Other Federal Operating Expenditures *		6,939.32	6,939.32
c. Total Operating Expenditures (Add a i, a ii, and b) >			
22. Transfers to Affiliated/Other Party Committees		50,100.00	82,150.00
23. Contributions to Federal Candidates/Committees and Other Political Committees			
24. Independent Expenditures (use Schedule E)			
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)			
26. Loan Repayments Made			
27. Loans Made			
28. Refunds of Contributions To:			
a. Individual/Persons Other Than Political Committees			
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contribution Refunds (Add a, b and c) >			
29. Other Disbursements		57,039.32	89,089.32
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >		57,039.32	89,089.32
31. Total Federal Disbursements (subtract line 23 a ii from line 30) >			
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans) (from line 11d)		11,281.25	37,428.00
33. Total Contribution Refunds (from line 28d)			
34. Net Contributions (other than loans) (subtract line 33 from line 32)		11,281.25	37,428.00
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >		6,939.32	6,939.32
36. Offsets to Operating Expenditures (from line 15)		6,939.32	6,939.32

SCHEDULE B

ITEMIZED DISBURSEMENTS

Contribute to Fed. Cands., etc.

Has separate schedule(s)
for each category of the
Detailed Summary Page

Page 1 of ____
For Line Number: 23

NAME OF CREDITOR: American Hospital Assn PAC

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

For the period 03/01/93 thru 03/31/93

Name and Address	Purpose of Disbursement, Election	Date	Amount
Watt for Congress 700 East Stonewall, #500 Charlotte, NC 28202	Contribution for Melvin Watt (NC-12-D)	03/30/93	\$1,000.00

DISTRICT 1993

YTD: \$1,000.00

1993 Special Election Fund 420 South Capital Street Washington, DC 2003	Contribution	03/30/93	\$5,000.00
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Subtotal this page:

\$6,000.00

Total this period (last page this line number only):

\$50,100.00

0
7
9
3
0
0
9

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☒ Hand Delivered

DATE OF RECEIPT

6-14-95

☐ First Class Mail

POSTMARKED

☐ Registered/Certified Mail

POSTMARKED

☐ No Postmark

☐ Postmark Illegible

☐ Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

SHH.

PREPARER

6-15-95

DATE PREPARED